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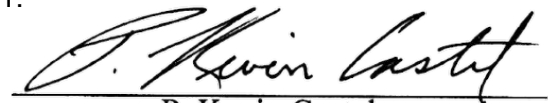
www.lauferlawgroup.com

February 18, 2021

Via ECF

Honorable Judge P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Time for government to answer extended to March 15, 2021.
Conference adjourned from February 26, 2021 to March 30,
2021 at 12:00 p.m. Dial-In No.: 1-888-363-4749,
Access Code: 3667981.
SO ORDERED.
Dated: 2/22/2021



P. Kevin Castel
United States District Judge

**Re: Amador v. United States of America, et al
20-cv-10492 (PKC)**

Dear Honorable Judge Castel:

We represent the plaintiff in this matter. This letter motion is being submitted to request both an adjournment for the Initial Pretrial Conference currently scheduled for February 26, 2021 at 12:00 p.m. and to request additional time to serve and an alternate service method for defendants, the Drug Enforcement Agency and Special Agent Luna due to evasion of service.

The basis for the request to adjourn the conference is that, to date, none have appeared for any of the defendants. The United States was served on December 22, 2020. (See Exhibit A attached hereto.). Therefore, holding a conference with just the plaintiff at this juncture might not be fruitful.

Both the Drug Enforcement Administration and Special Agent Marlow Luna refused to accept service and our process server was not given access to anyone from the DEA or Special Agent Luna to effectuate service. Service was attempted twice, December 23, 2020 and January 8, 2021, on both parties. (See Exhibit B attached hereto.)

It is respectfully requested the Court adjourn the scheduled Initial Pretrial Conference to a date it deems appropriate. It is also respectfully requested the Court deem service upon the security desk at the Drug Enforcement Administration security desk located at 99 10th Street, New York, New York 10011 as good and perfected service upon both the Drug Enforcement Administration and Special Agent Marlow Luna as well as any additional relief the Court deems just and proper.

No prior application for the requested relief has previously been submitted. Your affirmant was unable to ascertain whether the defendants consent to the requested relief since no one has appeared before the Court on their behalf.

Thank you for your attention to this matter.

Respectfully Submitted,

Andrew C. Laufer

ACL/nb

Via regular mail:

United States Department of Justice
Drug Enforcement Administration
8701 Morrisette Drive
Springfield, VA 22152

United States Department of Justice
Drug Enforcement Administration

And

Special Agent Marlow Luna
99 10th Avenue
New York, New York 10011

United States of America
86 Chambers Street
New York, New York 10007

LUIS AMADOR

Plaintiff

VS

UNITED STATES OF AMERICA, THE DRUG ENFORCEMENT ADMINISTRATION and SPECIAL AGENT MARLOW LUNA OF THE DRUG ENFORCEMENT ADMINISTRATION

Defendant

STATE OF NEW YORK, COUNTY OF NASSAU, SS.:

AFFIDAVIT OF SERVICE

Raed Ibrahim, being sworn deposes and states that, the Deponent is not a party herein, is over the age of 18 years and resides in the State of New York.

That on 12/22/2020, at 3:52 PM at 86 CHAMBERS STREET, NEW YORK, NY 10007, Deponent served the within Civil cover sheet, Complaint and Judges rules, with the index number and the filing date of the action were endorsed upon the face of the papers so served herein. On: UNITED STATES OF AMERICA, Defendant therein named, (hereinafter referred to as "subject").

By delivering to and leaving with Mr Stevens said individual to be Agent For Service Of Process who specifically stated he/she was authorized to accept service on behalf of the Corporation/Government Agency/Entity. A description of Mr Stevens is as follows:

Sex: Male Color of skin: White Color of hair: Gray Age: 51-65
Height: Over 6ft Weight: Over 200 Lbs. Other :

Sworn to before me on December 28, 2020

Patricia Rothfritz
Notary Public - State of New York
No. 01R06055503; Qualified in Nassau County
My Commission Expires February 26, 2023



Client's File No.: Amador

Process Server, Please Sign
Raed Ibrahim
Lic# 1326602
Job #: 2028800

AFFIDAVIT OF DUE DILIGENCE - ATTEMPTS TO LOCATE AND/OR SERVE

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Index/Case #: 20-CV-10492

Court Date:

Filing Date: December 15, 2020

Client: LAW OFFICE OF ANDREW C

Attorney: ANDREW LAUFER ESQ

LUIS AMADOR

Plaintiff

VS

UNITED STATES OF AMERICA, THE DRUG ENFORCEMENT ADMINISTRATION and
SPECIAL AGENT MARLOW LUNA OF THE DRUG ENFORCEMENT ADMINISTRATION *Defendant*
STATE OF NEW YORK, COUNTY OF NASSAU, SS.:

Raed Ibrahim, being duly sworn, deposes and says: that deponent is not a party to this action, is over the age of eighteen (18) years and resides in the State of New York ; deponent attempted to serve the within Civil cover sheet, Complaint and Judges rules

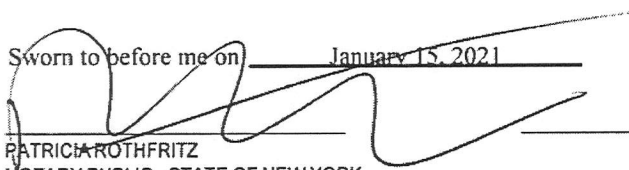
Upon DRUG ENFORCEMENT ADMINISTRATION

the defendant / respondent therein named, and that after due search, careful inquiry and diligent attempts the deponent was unable to effect process upon the person being served because of the following reason(s):


Date/Time: 12/23/2020 13:06:00 Attempt at: 99 10TH ST, NEW YORK , NY 10011 Results: SPOKE TO A DEA EMPLOYEE AND WAS TOLD THEY CAN NOT ACCEPT AT THE MOMENT SHE ALSO TOLD ME SHE MIGHT NOT BE ABLE TO ACCEPT AT ALL

Date/Time: 01/08/2021 15:20:00 Attempt at: 99 10TH Ave, NEW YORK , NY 10011 Results: SECURITY CALLED UP AND THEY REFUSED TO ACCEPT DOCUMENTS AND REFUSED TO COME DOWN.

Sworn to before me on January 15, 2021


PATRICIA ROTHFRITZ
NOTARY PUBLIC - STATE OF NEW YORK
NO. 01R06055503; QUALIFIED IN NASSAU COUNTY
MY COMMISSION EXPIRES FEBRUARY 26, 2023




Raed Ibrahim

Lic# 1326602
JobID 2028805
Client ID Amador

AFFIDAVIT OF DUE DILIGENCE - ATTEMPTS TO LOCATE AND/OR SERVE

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Index/Case #: 20-CV-10492

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Attorney: ANDREW LAUFER ESQ

LUIS AMADOR

Plaintiff

VS

UNITED STATES OF AMERICA, THE DRUG ENFORCEMENT ADMINISTRATION and
SPECIAL AGENT MARLOW LUNA OF THE DRUG ENFORCEMENT ADMINISTRATION ^{Defendant}
STATE OF NEW YORK, COUNTY OF NASSAU, SS.:

Raed Ibrahim, being duly sworn, deposes and says: that deponent is not a party to this action, is over the age of eighteen (18) years and resides in the State of New York ; deponent attempted to serve the within Civil cover sheet, Complaint and Judges rules

Upon SPECIAL AGENT MARLOW LUNA OF THE DRUG ENFORCEMENT ADMINISTRATION
the defendant / respondent therein named, and that after due search, careful inquiry and diligent attempts the deponent was unable to effect process upon the person being served because of the following reason(s):

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Sworn to before me on January 15, 2021

PATRICIA ROTHFRITZ
NOTARY PUBLIC - STATE OF NEW YORK
NO. 01R06055503; QUALIFIED IN NASSAU COUNTY
MY COMMISSION EXPIRES FEBRUARY 26, 2023



Raed Ibrahim

Lic# 1326602
JobID 2028806
Client ID Amador